

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

GREGORY BROOKS,

Plaintiff,

-against-

THE DOE FUND, INC.,  
TERRY COOPER individually and in his official capacity,  
JAMES WASHINGTON individually and in his official  
capacity,  
And  
ANTHONY WIGGINS individually and in his official  
capacity,

Defendants.

Civ. No.: 17-3626

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, pursuant to Fed. R. Civ. P. 56 and the Local Rules of this Court, and upon Defendants The Doe Fund and James Washington's (collectively "TDF Defendants") Notice of Motion for Summary Judgment, Memorandum of Law in Support of TDF Defendants' Motion for Summary Judgment, Local Rule 56.1 Statement of Undisputed Material Facts, the Declaration of Lori D. Bauer In Support of TDF Defendants' Motion for Summary Judgment, and the exhibits attached thereto, and the Affidavit of Eunice Gilmore In Support of TDF Defendants' Motion for Summary Judgment, TDF Defendants will move this Court located at 225 Cadman Plaza East, Brooklyn, New York, 11201 for an Order granting TDF Defendants' Motion for Summary Judgment and dismissing the claims against TDF and Washington in Plaintiff's Complaint in their entirety with prejudice, and granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

JACKSON LEWIS P.C.  
666 Third Avenue  
New York, New York 10017  
(212) 545-4000

Dated: February 7, 2019  
New York, New York

By: /s/ Lori D. Bauer  
Lori D. Bauer  
Steven J. Seidenfeld, Esq.

*ATTORNEYS FOR DEFENDANTS  
THE DOE FUND AND JAMES WASHINGTON*